

**DRAFT**  
**REVISED TPA COMMENTS ON THE DRAFT EMISSIONS INVENTORY**  
**(Source Categories Affecting the Transportation Conformity Budget)**

Motor Vehicle Exhaust

*\*\*This section has been revised in response to ARB comments provided 2/24/03.*

We have completed the review of the revised motor vehicle exhaust estimates for the base case inventories that were provided February 13, 2002. We are now able to replicate the results. No further revisions appear necessary at this time.

Paved Road Dust

*\*\*This section has been revised in response to ARB comments provided 2/24/03.*

We have completed the initial review of the paved road dust emission estimates for the base case inventories (99, 02, 05, 08, 10). EICs: 640-635-5400-0000, 640-637-5400-0000, 640-639-5400-0000, 640-641-5400-0000, and 640-643-5400-0000)

The attached spreadsheet provides revised VMT for all analysis years, including the base year 1999. Growth factors (based on VMT by facility type) are also included. Again, approximately 50 percent of the growth factors currently used are less than the revised TPA data.

If the rainfall adjustment factor is revised by ARB, please forward the updated information to me as soon as possible.

At this time, we request that ARB update both the base case and future year emission estimates for paved road dust emissions using the data provided in the attached spreadsheet. Please provide the revised paved road dust emissions for review as soon as they are completed.

Unpaved Road Dust

*\*\*This section has NOT been revised since originally submitted to ARB on 1/24/03. No response has been received to date.*

We have completed the initial review of the unpaved road dust emission estimates (Unpaved1999Nov29Final) for the base case inventory (1999). Unfortunately, we cannot extract EIC level emissions from the base case inventories from the SJV Forecast EI zip file to confirm the emissions totals or evaluate future year estimates. It is important to note that only City/County unpaved road dust (EIC: 645-638-5400-0000) should be included in the transportation conformity budgets. Please provide the EIC level emissions for review as soon as possible.

Again, if the rainfall adjustment factor is revised by ARB, please forward the updated information to me as soon as possible.

### Road Construction Dust

*\*\*Two minor clarifications have been added to this section in response to ARB comments provided 2/24/03.*

Based on our initial review, it appears that the differences in the 1999 emissions estimates are either due to rounding or calculating the average daily estimate based on 365 instead of 260 (because construction is assumed to occur 5 days per week, instead of 7 days per week). In addition, due to the rounding currently used, some county emissions are artificially set to zero. A similar situation arose in the Ozone Rate-of-Progress Plan. To resolve, ARB and the District agreed to estimate emissions in the “hundredths of a ton/day, rounding up to the nearest 0.1 tons/day” (language from footnote added to emissions tables). We request that the same approach be used for the PM-10 Plan if emissions are going to be reported in tenths; if hundredths are used, this issue is mute.

Unfortunately, we cannot extract EIC level emissions from the base case inventories from the SJV Forecast EI zip file to confirm the emissions totals or evaluate future year estimates. It is important to note that road construction dust (EIC: 630-634-5400-0000) should be included in the transportation conformity budgets.

The growth factors supplied by ARB indicate the parameter is based on employment. However, the TPAs supplied future year mileage in July/August 2002 to be used for the PM-10 Plan. Approximately 50 percent of the growth factors currently used are less than would be had the TPA data been used.

At this time, we request that ARB update the growth factors to reflect the data provided by the TPAs for the Plan. The attached spreadsheet summarized the original data provided, calculates the appropriate growth factors (based on lane miles constructed per year), and provides a comparison to the growth factors currently used by ARB. Note that 3 miles were added to the Kern mileage in 2002 and the Tulare mileage in 2008 to avoid a zero value. Please provide the revised road construction dust emissions for review as soon as they are completed.